

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

Bruce Cohn,

Plaintiff,

v.

Anna Popescu, *et al*,

Defendants.

Case No. 1:24-cv-00337

**Motion to File Documents
Under Seal**

Pursuant to Local Rule CV-5 of the United States District Court for the Eastern District of Texas and the Protective Order entered by this Court on April 9, 2025,¹ Plaintiff respectfully moves to file the following documents under seal: Plaintiff's Motion for Preliminary Injunction.

I. Basis for Sealing

The documents sought to be sealed contain confidential information as defined by the Court's Protective Order, including sensitive financial data in the form of accountholder names and blockchain addresses provided to Plaintiff by Binance Holdings, Ltd. The Protective Order permits the filing of such confidential information under seal to protect the parties' legitimate privacy interests. The

¹ Dkt. 28.

Defendants in this matter are alleged cybercriminals who have not yet made an appearance in this matter, and therefore Plaintiff has not had the opportunity to confer with them regarding this motion.

II. Compliance with Local Rule CV-5

Pursuant to Local Rule CV-5(a)(7)(C), this Motion is filed separately and immediately before the documents sought to be sealed. All documents to be sealed are marked “Filed Under Seal” at the top, as required. Counsel certifies that the documents contain confidential information as defined by the Protective Order and that sealing is necessary to protect the interests outlined therein.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion and permit the filing of the identified documents under seal, consistent with Local Rule CV-5 and the Protective Order.

Dated: June 18, 2025

Respectfully submitted,

THE HODA LAW FIRM, PLLC

A handwritten signature in black ink, appearing to read "M Hoda". The signature is enclosed within a large, loopy, oval-shaped flourish.

Marshal J. Hoda, Esq.
Tx. Bar No. 2411009
Alexander J. Crous, Esq.
Tx. Bar No. 24136488
12333 Sowden Road, Suite B
PMB 51811
Houston, TX 77080
o. (832) 848-0036
marshal@thehodalawfirm.com

Attorneys for Plaintiff